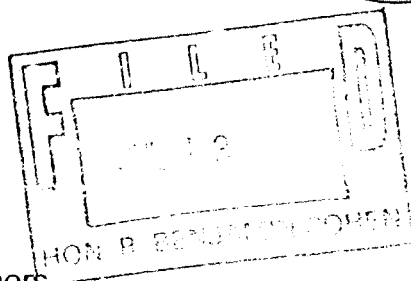


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and the Division of Consumer Affairs



By: Lynn Denis  
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SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION-ESSEX COUNTY  
DOCKET NO. C-171-00

JOHN J. FARMER, JR., Attorney  
General of the State of New  
Jersey; MARK S. HERR, Director of  
the Division of Consumer Affairs;  
and the NEW JERSEY STATE BOARD  
OF SOCIAL WORK EXAMINERS

Plaintiffs,

vs.

MARY MCKAY

Defendant

Civil Action

CONSENT ORDER AND JUDGMENT

This matter was opened to the Court by John J. Farmer, Jr., Attorney General of New Jersey, counsel for plaintiffs, by Deputy Attorney General Lynn Denis appearing, pursuant to N.J.S.A. 45:1-23, 45:15BB-1 et seq., 56:8-8 and 56:8-13. It appears upon a review of the Verified Complaint, supporting certifications and exhibits submitted by the

Attorney General that defendant Mary McKay has engaged in the unlicensed practice of social work and in the use of false pretense. Defendant McKay admits that her conduct constituted multiple violations of N.J.S.A. 45:15BB-4 and 56:8-2, in that she has sought and obtained employment as a social worker and in related fields using a fraudulent college diploma and fraudulent certifications as a social worker in the State of New Jersey. The defendant has agreed to the entry of a Consent Order and Judgment settling this matter. It further appears that the entry of a permanent injunction and the imposition of civil penalties and costs against defendant Mary McKay are warranted, and for good cause shown,

IT IS on this 20<sup>th</sup> day of JULY, 2000, ORDERED:

1. Defendant Mary McKay shall be and hereby is permanently enjoined from offering or performing any social work services or engaging in any practice requiring licensure or certification by the New Jersey State Board of Social Work Examiners unless and until she is duly licensed, certified or otherwise registered to do so.

2. Defendant Mary McKay shall be and hereby is permanently enjoined from employment of false pretense or misrepresentation by holding herself out as duly licensed or certified by the Board of Social Work Examiners or as a college graduate in psychology, social services or a related field for the purpose of engaging in or offering to engage in any function within the practice of social work in the State of New Jersey unless and until she has duly earned and has been awarded the credentials she claims.

3. Defendant Mary McKay is hereby assessed the sum of \$17,500 as follows:

a. Pursuant to N.J.S.A. 45:1-25 as amended by P.L. 1999, Chapter 403, §9, effective January 18, 2000, N.J.S.A. 56:8-11 and N.J.S.A. 56:8-19, an assessment of \$5,322.42 for the use of the State;

b. Pursuant to N.J.S.A. 45:1-23 and N.J.S.A. 45:1-25 as amended, a civil penalty assessment of \$2,177.58 for the unlicensed practice of social work in violation of N.J.S.A. 45:1-25 and N.J.S.A. 45:15BB-1 et seq.

c. Pursuant to N.J.S.A. 56:8-13, a civil penalty assessment of \$10,000 for the engagement in false pretense and misrepresentation in violation of N.J.S.A. 56:8-2.

4. Payment of the sum of \$17,500 shall be made as follows:

a. Defendant shall tender payment of \$3,000 immediately upon signing the within Order, which payment shall be made by certified check or money order made payable to the New Jersey State Board of Social Work Examiners.

b. Thereafter, payment of all sums assessed herein shall be made within ten days of the entry of this Order. The sum of \$4,500 of the total balance remaining shall be made payable to the New Jersey State Board of Social Work Examiners. The sum of \$10,000 shall be made payable to the New Jersey Division of Consumer Affairs.

c. Notwithstanding the provision for payment in subparagraph 4(b), the defendant may pay the balance of \$14,500 in installments. In such event, the defendant shall make thirty (30) subsequent payments, each in the sum of \$500 plus interest at the rate of 5%, pursuant to R. 4:42-11, as specified in Schedule A, which is

hereby attached to this Order and incorporated herein by reference. Said subsequent payments shall be made pursuant to the following schedule: Beginning on or before August 1, 2000, and on or before the first day of each of the seven (7) succeeding months, defendant shall make payments to the Board of Social Work Examiners in the amount of \$515.18. On or before April 1, 2001, defendant shall pay the sum of \$515.18 in two separate payments: \$412.14 shall be made payable to the Board of Social Work Examiners, and \$103.04 shall be made payable to the Division of Consumer Affairs. Thereafter, twenty (20) payments in the sum of \$515.18 each shall be made to the Division of Consumer Affairs, beginning on or before May 1, 2001 and on or before the first day of each of the twenty (20) succeeding months. On or before January 1, 2003, the last payment, in the sum of \$513.04, shall be due. In the event the defendant fails to make any required payment on or before the date it is scheduled to be paid, the entire amount of all unpaid portions of the total sum (with interest) shall become immediately due.

5. All payments consented to and ordered herein shall be made by certified check or money order. Sums made payable to the New Jersey State Board of Social Work Examiners shall be delivered to:

Leslie G. Aronson, Executive Director  
124 Halsey Street  
P.O. Box 45033  
Newark, New Jersey 07101.

Sums made payable to the Division of Consumer Affairs shall be delivered to:

New Jersey Department of Law and Public Safety  
Division of Consumer Affairs

124 Halsey Street  
P.O. Box 45025  
Newark, New Jersey 07101  
Att. Case Management Tracking Unit.

6. Installment payments made pursuant to paragraph 4 above shall first be applied to fulfillment of the costs and fees obligations, and thereafter to fulfillment of the civil penalties obligation.

7. It is hereby ordered and agreed that any violation of N.J.S.A. 45:15BB-4 or of N.J.S.A. 56:8-2 shall constitute subsequent offenses subject to enhanced civil penalties within the meaning of N.J.S.A. 45:1-25 as amended and N.J.S.A. 56:8-13.

HON. R. BENJAMIN COHEN

R. Benjamin Cohen, J.S.C.

I have read and I understand the terms and conditions of the within Order and I agree to be bound by them. I hereby agree to the form and give my consent to the entry of this Order.

Mary McKay  
Mary McKay, Defendant

John J. Farmer, Jr.  
JOHN J. FARMER, JR.  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiffs  
BY: Lynn Denis, DAG